

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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DISTRICT OF PUERTO RICO
2005 APR 13 P 4:09

ANGEL DAVID MORALES
VALLELLANES,
Plaintiff,

v.

JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET. ALS.,
Defendants.

CIVIL NO. 97-2459 (JAG)

DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES;
UNFAIR LABOR PRACTICES;
BREACH OF COLLECTIVE
BARGAINING AGREEMENT

TRIAL BY JURY IS HEREBY
REQUESTED

ANSWER TO INTERROGATORY

1. Angel David Morales - Vallellanes
Calle Betania #28
Urb. Muñoz Rivera
Guaynabo, P.R. 00969.

583-23-1827
June 23, 1960
San Juan, P.R.
2.
 - a) Since 1988 I have been working with the United States Postal Service.
 - b) Yes
 - c) Not working since February 1997, because harassment and discrimination in the place of work at USPS. My income comes from the office of Worker's Compensation Program (OWCP) and is equivalent to a 66% of my salary at the rate of 1997 since I stop working.
3.
 - a) Margarita Janer High School in Guaynabo since 1975 to 1978.
 - b) UPR - Mayaguez campus 1978-1980

c) UPR - Rio Piedras campus 1980-1985

Bachelor in Art.

4. See Exhibit # 168 as marked for Trial and preciously submitted.
5. I have only been suspended and/or disciplined by the USPS at work. The circumstances recording the suspensions are included in the paragraphs 18 to 90 of the Amended Complaint.
6. See paragraphs 18 to 90 of the Amended Complaint.
7. See the list of witnesses of plaintiff previously provided.
8. See paragraph 18 to 90 of the Amended Complaint.
9. See paragraph 18 to 90 of the Amended Complaint. The evidence recording of the area covering paragraph are the two (2) EEO'S already provided during the depositions taken by plaintiff , And the exhibits included for trial previously provided.
10. No, I have never had and accident covered by the Federal Employees Compensation Act ("FECA").
11. See the Amended Complaint.
12. I)
ii) Guillermo Hoyos, psychiatrist since Feb. 1997
Vicente Feliciano, economic advisor.
13. I)
ii) See Amended Complaint.
According to plaintiff's physician doctor Hoyos and all of the psychiatrists of OWCP plaintiff is unable to work, notwith standing plaintiff took a course to become a paralegal three (3) years ago and now took the test to enter to law school in order to seek an income and mitigate the damages.
14. No, I do not claim medical expenses.
15. Medical expenses have been paid by Triple S and OWCP. The information regarding the amount and date of payment is the same prescription by doctor Hoyos in the last eight (8) years. (See Exhibit I)

ADM V


16. See list of witness provided by plaintiff .
17. See list of witnesses provided by plaintiff.
18. All evidence and exhibits have already been provided and marked.
19. N/A
20. N/A
21. See answer #18.

VERIFICATION

I, Angel David Morales-Vallellanes, of legal age, single, resident of Guaynabo, Puerto Rico,
being duly sworn, depose and state:

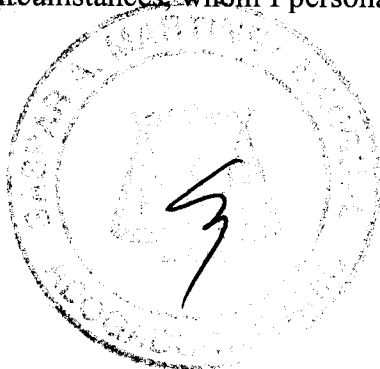
- ADMV
1. That the above are my personal circumstances.
 2. That I have read the foregoing the answer to interrogatories that the allegations contained are true to my best information and by personal knowledge.


In San Juan, Puerto Rico, this 13 day of abril, 2005.


ANGEL DAVID MORALES-VALLELLANES

AFFIDAVIT NO. 547

Sworn and subscribed before me by Angel David Morales-Vallellanes, of the above stated
personal circumstances, whom I personally know, this 13 day of abril, 2005, in San Juan, Puerto
Rico.




NOTARY PUBLIC